Southern Nuclear

Jamie M. Coleman
Regulatory Affairs Director
Vogtle 3 & 4

7825 River Road
Waynesboro, GA 30830
706-848-6926 tel

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Southern Nuclear Operating Company
Vogtle Electric Generating Plant Unit 4
ITAAC Closure Notification on Completion of ITAAC 2.3.13.08 [Index Number 470]

Ladies and Gentlemen:

In accordance with 10 CFR 52.99(c)(1), the purpose of this letter is to notify the Nuclear Regulatory Commission (NRC) of the completion of Vogtle Electric Generating Plant (VEGP) Unit 4 Inspections, Tests, Analyses, and Acceptance Criteria ITAAC Item 2.3.13.08 [Index Number 470]. Testing was performed to obtain samples of the reactor coolant and containment atmosphere. Testing was also performed to verify that controls exist in the main control room (MCR) to remotely operate system valves, that safety related displays can be retrieved in the MCR and that system valves operate as required. The closure process for this ITAAC is based on the guidance described in NEI 08-01, "Industry Guideline for the ITAAC Closure Process under 10 CFR Part 52," which was endorsed by the NRC in Regulatory Guide 1.215.

This letter contains no new NRC regulatory commitments. Southern Nuclear Operating Company (SNC) requests NRC staff confirmation of this determination and publication of the required notice in the Federal Register per 10 CFR 52.99.

If there are any questions, please contact Kelli Roberts at 706-848-6991.

Respectfully submitted,

Jamie Coleman

Jamie M. Coleman
Regulatory Affairs Director Vogtle 3 & 4

Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 4 ITAAC Closure Notification on Completion of ITAAC 2.3.13.08 [Index Number 470]

JMC/PCM/sfr

cc: Regional Administrator, Region ll
Director, Office of Nuclear Reactor Regulation (NRR)
Director, Vogtle Project Office NRR
Senior Resident Inspector – Vogtle 3 & 4

Southern Nuclear Operating Company
ND-23-0359
Enclosure

Vogtle Electric Generating Plant (VEGP) Unit 4
ITAAC Closure Notification on Completion of ITAAC 2.3.13.08 [Index Number 470]

ITAAC Statement

Design Commitment

8. The PSS provides the nonsafety-related function of providing the capability of obtaining reactor coolant and containment atmosphere samples.

9. Safety-related displays identified in Table 2.3.13-1 can be retrieved in the MCR.

10.a) Controls exist in the MCR to cause those remotely operated valves identified in Table 2.3.13-1 to perform active functions.

10.b) The valves identified in Table 2.3.13-1 as having PMS control perform an active function after receiving a signal from the PMS.

11.b) After loss of motive power, the remotely operated valves identified in Table 2.3.13-1 assume the indicated loss of motive power position.

12. Controls exist in the MCR to cause the valves identified in Table 2.3.13-2 to perform the listed function.

Inspections/Tests/Analyses

Testing will be performed to obtain samples of the reactor coolant and containment atmosphere.

Inspection will be performed for retrievability of the safety-related displays in the MCR.

Stroke testing will be performed on the remotely operated valves identified in Table 2.3.13-1 using the controls in the MCR.

Testing will be performed on remotely operated valves listed in Table 2.3.13-1 using real or simulated signals into the PMS.

Testing of the remotely operated valves will be performed under the conditions of loss of motive power.

Testing will be performed on the components in Table 2.3.13-2 using controls in the MCR.

Acceptance Criteria

A sample is drawn from the reactor coolant and the containment atmosphere.

The safety-related displays identified in Table 2.3.13-1 can be retrieved in the MCR.

Controls in the MCR operate to cause those remotely operated valves identified in Table 2.3.13-1 to perform active functions.

The remotely operated valves identified in Table 2.3.13-1 as having PMS control perform the active function identified in the table after receiving a signal from the PMS.

After loss of motive power, each remotely operated valve identified in Table 2.3.13-1 assumes the indicated loss of motive power position.

Controls in the MCR cause valves identified in Table 2.3.13-2 to perform the listed functions.

ITAAC Determination Basis

Testing and inspections are performed to verify that the Primary Sampling System (PSS) performs the following:

- The PSS provides the nonsafety-related function of providing the capability of obtaining reactor coolant and containment atmosphere samples.
- Safety-related displays identified in the Combined License (COL) Appendix C Table 2.3.13-1 (Attachment A) can be retrieved in the Main Control Room (MCR).
- Controls exist in the MCR to cause those remotely operated valves identified in COL Appendix C Table 2.3.13-1 (Attachment B) to perform active functions.
- The valves identified in COL Appendix C Table 2.3.13-1 (Attachment C) as having Protection and Safety Monitoring System (PMS) control perform an active function after receiving a signal from the PMS.
- After loss of motive power, the remotely operated valves identified in COL Appendix C Table 2.3.13-1 (Attachment D) assume the indicated loss of motive power position.
- Controls exist in the MCR to cause the valves identified in COL Appendix C Table 2.3.13-2 (Attachment E) to perform the listed function.

A sample is drawn from the reactor coolant and the containment atmosphere.

Testing was performed to obtain samples of the reactor coolant and containment atmosphere using Unit 4 preoperational test procedure listed in SV4-PSS-ITR-800470 (Reference 1). A sample was drawn from each sample point for reactor coolant system and containment atmosphere.

The completed test procedure results (Reference 1) confirm that for Unit 4 a sample is drawn from the reactor coolant and the containment atmosphere.

The safety-related displays identified in Table 2.3.13-1 can be retrieved in the MCR.

Inspections were performed as documented in SV4-PSS-ITR-803470 (Reference 4), and visually confirmed that when each of the displays of the plant parameter identified in Attachment A was summoned using the MCR PMS Visual Display Units (VDUs), the expected display appeared on the PMS VDU.

The completed inspection results (Reference 4) confirm that safety-related displays identified in Table 2.3.13-1 can be retrieved in Unit 4 MCR.

Controls in the MCR operate to cause those remotely operated valves identified in Table 2.3.13-1 to perform active functions.

Testing was performed using Plant Control System (PLS) controls in the MCR to stroke test each valve in Attachment B in accordance with Unit 4 component test package work order listed in SV4-PSS-ITR-802470 (Reference 3).

Testing established initial conditions with each valve identified in Attachment B verified locally and in the MCR to be in the open position. Each valve was stroked to its active function using PLS controls and proper valve position indication was verified locally and in the MCR.

The completed test results (Reference 3) confirm that controls in Unit 4 MCR operate to cause the remotely operated valves identified in Table 2.3.13-1 to perform active functions.

The remotely operated valves identified in Table 2.3.13-1 as having PMS control perform the active function identified in the table after receiving a signal from the PMS.

Testing was performed in accordance with Unit 4 component test package work orders listed in SV4-PSS-ITR-802470 (Reference 3). These component test packages confirm that the remotely operated valves perform the active function identified in Attachment C after a signal is input to the PMS.

The work orders in Reference 3 established initial conditions with each valve verified locally and in the MCR to be in the open position. An actuation signal was generated by PMS using the PMS Maintenance and Test Panel (MTP) to generate a signal to cause the valves in Attachment C to transfer to the active function position (closed) and each valve position was verified locally and in the MCR.

The completed test results (Reference 3) confirm the Unit 4 remotely operated valves identified in Table 2.3.13-1 as having PMS control perform the active function identified in the table after receiving a signal from the PMS.

After loss of motive power, each remotely operated valve identified in Table 2.3.13-1 assumes the indicated loss of motive power position.

Testing was performed in accordance with Unit 4 component test package work orders listed in SV4-PSS-ITR-801470 (Reference 2) to verify that each remotely operated valve identified in Attachment D assumes the indicated loss of motive power position upon a loss of motive power.

Testing on the solenoid operated valves (SOV) in Attachment D was performed by placing the valves in the open position and opening the power supply to their solenoid. This causes the solenoid to de-energize which closes the valve. The valves were verified in the MCR to transfer to their loss of motive power position (closed). SOVs have no external valve position therefore these valves were not verified locally.

Testing on the air operated valves (AOV) in Attachment D was performed by placing the valves in the open position and opening the power supply to their air supply solenoid. This causes the solenoid to de-energize which closes the air supply to the valve and opens a vent port to vent off the air in the actuator. The valves were verified locally and in the MCR to transfer to their loss of motive power position (closed).

The completed test results (Reference 2) confirm that after loss of motive power, each remotely operated valve identified in Table 2.3.13-1 assumes the indicated loss of motive power position for Unit 4.

Controls in the MCR cause valves identified in Table 2.3.13-2 to perform the listed functions.

Testing was performed using Plant Control System (PLS) controls in the MCR to stroke test each valve in Attachment E in accordance with Unit 4 component test package work order listed in SV4-PSS-ITR-801470 (Reference 2). Each valve was stroked to the listed functions (open and closed) and proper valve position indication was verified locally and in the MCR.

The completed test results (Reference 2) confirm that controls in Unit 4 MCR cause valves identified in Table 2.3.13-2 to perform their listed functions.

References 1 through 4 are available for NRC inspection as part of ITAAC 2.3.13.08 Unit 4 Completion Package (Reference 5).

ITAAC Finding Review

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all findings pertaining to the subject ITAAC and associated corrective actions. This review found there were no relevant ITAAC findings associated with this ITAAC. The ITAAC completion review is documented in the ITAAC Completion Package for ITAAC 2.3.13.08 (Reference 5) and is available for NRC review.

ITAAC Completion Statement

Based on the above information, SNC hereby notifies the NRC that ITAAC 2.3.13.08 was performed for VEGP Unit 4 and that the prescribed acceptance criteria were met.

Systems, structures, and components verified as part of this ITAAC are being maintained in their as-designed, ITAAC compliant condition in accordance with approved plant programs and procedures.

References (available for NRC inspection)

1. SV4-PSS-ITR-800470, Rev. 0, “Unit 4 Reactor Coolant and Containment Atmosphere Sampling: ITAAC 2.3.13.08 Item 8.NRC Index Number: 470”
2. SV4-PSS-ITR-801470, Rev. 0, “Unit 4 Reactor Coolant and Containment Atmosphere Sampling: ITAAC 2.3.13.08 Items 11.b) and 12 NRC Index Number: 470”
3. SV4-PSS-ITR-802470, Rev. 0, “Unit 4 Reactor Coolant and Containment Atmosphere Sampling: ITAAC 2.3.13.08 Items 10a and 10.b NRC Index Number: 470”
4. SV4-PSS-ITR-803470, Rev. 0, “Unit 4 Reactor Coolant and Containment Atmosphere Sampling: ITAAC 2.3.13.08 Item 9 NRC Index Number: 470”
5. 2.3.13.08-U4-CP-Rev0, “ITAAC Completion Package”

Attachment A
***Excerpt from COL Appendix C Table 2.3.13-1**

Table 2.3.13-1		
***Equipment Name**	***Tag No.**	***Safety-Related Display**
Containment Air Sample Containment Isolation Valve Inside Reactor Containment (IRC)	PSS-PL-V008	Yes (Valve Position)
Liquid Sample Line Containment Isolation Valve IRC	PSS-PL-V010A	Yes (Valve Position)
Liquid Sample Line Containment Isolation Valve IRC	PSS-PL-V010B	Yes (Valve Position)
Liquid Sample Line Containment Isolation Valve Outside Reactor Containment (ORC)	PSS-PL-V011A	Yes (Valve Position)
Liquid Sample Line Containment Isolation Valve ORC	PSS-PL-V011B	Yes (Valve Position)
Sample Return Line Containment Isolation Valve ORC	PSS-PL-V023	Yes (Valve Position)
Sample Return Containment Isolation Valve IRC	PSS-PL-V024	Yes (Valve Position)
Air Sample Line Containment Isolation Valve ORC	PSS-PL-V046	Yes (Valve Position)

Attachment B
***Excerpt from COL Appendix C Table 2.3.13-1**

Table 2.3.13-1			
***Equipment Name**	***Tag No.**	***Remotely Operated Valve**	***Active Function**
Containment Air Sample Containment Isolation Valve Inside Reactor Containment (IRC)	PSS-PL-V008	Yes	Transfer Closed
Liquid Sample Line Containment Isolation Valve IRC	PSS-PL-V010A	Yes	Transfer Closed
Liquid Sample Line Containment Isolation Valve IRC	PSS-PL-V010B	Yes	Transfer Closed
Liquid Sample Line Containment Isolation Valve Outside Reactor Containment (ORC)	PSS-PL-V011A	Yes	Transfer Closed
Liquid Sample Line Containment Isolation Valve ORC	PSS-PL-V011B	Yes	Transfer Closed
Sample Return Line Containment Isolation Valve ORC	PSS-PL-V023	Yes	Transfer Closed
Sample Return Containment Isolation Valve IRC	PSS-PL-V024	Yes	Transfer Closed
Air Sample Line Containment Isolation Valve ORC	PSS-PL-V046	Yes	Transfer Closed

Attachment C
***Excerpt from COL Appendix C Table 2.3.13-1**

Table 2.3.13-1			
***Equipment Name**	***Tag No.**	***Control PMS**	***Active Function**
Containment Air Sample Containment Isolation Valve Inside Reactor Containment (IRC)	PSS-PL-V008	Yes	Transfer Closed
Liquid Sample Line Containment Isolation Valve IRC	PSS-PL-V010A	Yes	Transfer Closed
Liquid Sample Line Containment Isolation Valve IRC	PSS-PL-V010B	Yes	Transfer Closed
Liquid Sample Line Containment Isolation Valve Outside Reactor Containment (ORC)	PSS-PL-V011A	Yes	Transfer Closed
Liquid Sample Line Containment Isolation Valve ORC	PSS-PL-V011B	Yes	Transfer Closed
Sample Return Line Containment Isolation Valve ORC	PSS-PL-V023	Yes	Transfer Closed
Sample Return Containment Isolation Valve IRC	PSS-PL-V024	Yes	Transfer Closed
Air Sample Line Containment Isolation Valve ORC	PSS-PL-V046	Yes	Transfer Closed

Attachment D
***Excerpt from COL Appendix C Table 2.3.13-1**

Table 2.3.13-1			
***Equipment Name**	***Tag No.**	***Remotely Operated Valve**	***Loss of Motive Power Position**
Containment Air Sample Containment Isolation Valve Inside Reactor Containment (IRC)	PSS-PL-V008	Yes	Closed
Liquid Sample Line Containment Isolation Valve IRC	PSS-PL-V010A	Yes	Closed
Liquid Sample Line Containment Isolation Valve IRC	PSS-PL-V010B	Yes	Closed
Liquid Sample Line Containment Isolation Valve Outside Reactor Containment (ORC)	PSS-PL-V011A	Yes	Closed
Liquid Sample Line Containment Isolation Valve ORC	PSS-PL-V011B	Yes	Closed
Sample Return Line Containment Isolation Valve ORC	PSS-PL-V023	Yes	Closed
Sample Return Containment Isolation Valve IRC	PSS-PL-V024	Yes	Closed
Air Sample Line Containment Isolation Valve ORC	PSS-PL-V046	Yes	Closed

Attachment E

Table 2.3.13-2		
Equipment Name	**Tag No.**	**Control Function**
Hot Leg 1 Sample Isolation Valve	PSS-PL-V001A	Transfer Open/Transfer Closed
Hot Leg 2 Sample Isolation Valve	PSS-PL-V001B	Transfer Open/Transfer Closed